

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

UNITED STATES OF AMERICA,
Plaintiff,
v.

Case: 5:23-cr-20245
Assigned To : Levy, Judith E.
Referral Judge: Altman, Kimberly G.
Assign. Date : 4/20/2023
Description: INDI USA V. SEALED
(KB)

Violations: 18 U.S.C. § 922(a)(6)

OMAR SHORTER JR.,

Defendant.

INDICTMENT

THE GRAND JURY CHARGES:

COUNTS 1-12

18 U.S.C. § 922(a)(6)

False Statement During Purchase of a Firearm

On or about the following dates, in the Eastern District of Michigan, Southern Division, Omar Shorter Jr., in connection with the acquisition of firearms from licensed dealers of firearms within the meaning of Chapter 44, Title 18, United States Code, knowingly made false and fictitious written statements to licensed dealers of firearms, which statements were intended to deceive and were likely to deceive the dealers, as to a fact material to the lawfulness of such sales of said firearms to the defendant under chapter 44 of Title 18, in that the defendant did falsely execute Department of Justice, Bureau of Alcohol, Tobacco, Firearms,

and Explosives Form 4473, Firearms Transactions Records, in which he claimed to be the actual purchaser of said firearms listed below, when in fact another individual was the actual transferee/buyer of the firearms:

Count	Date of False Statement	Licensed Dealer of Firearms	Firearm(s) Purchased
1	10/24/2020	Fast Lane Outdoor Supply (Fast Lane)	Anderson Manufacturing, AM-15, 5.56x45mm, serial #20259903 Anderson Manufacturing, AM-15, 5.56x45mm, serial #20237328
2	5/7/2021	Fast Lane	Karri's Guns (Podunk, Inc.), 5.56x45mm, serial #A02171 Karri's Guns (Podunk, Inc.), 5.56x45mm, serial #A02172
3	5/15/2021	Fast Lane	Anderson Manufacturing, AM-15, 5.56x45mm, serial #21085863 Anderson Manufacturing, AM-15, 5.56x45mm, serial #21085864
4	5/17/2021	Fast Lane	Karri's Guns (Podunk, Inc.) – Auto Ordnance, .223 caliber, serial #A002170
5	5/17/2021	Target Sports	Glock, Model 29, 10mm, serial #BTHW713 Glock, Model 19, 9mm, serial #BTDD403

6	5/22/2021	Target Sports	Glock, Model 23, .40 caliber, serial #BTSN979
7	5/23/2021	Target Sports	Glock, Model 30, .45 caliber, serial #BTSV395
8	6/13/2021	Fast Lane	SOTA Arms Inc., 5.56x45mm, serial #PA14799 SOTA Arms Inc., 5.56x45mm, serial #PA14800 SOTA Arms Inc., 5.56x45mm, serial #PA14795 SOTA Arms Inc., 5.56x45mm, serial #PA4798
9	7/7/2021	Action Impact	Glock, model 43, 9mm pistol, serial #AFVH382
10	8/1/2021	Sportsman's Warehouse	Glock, model 23, .40 caliber pistol, serial #WPP092
11	12/5/2022	Action Impact	Taurus, model G3C, 9mm, serial #ADB009420
12	12/9/2022	Action Impact	Taurus, model G3C, 9mm, serial #ADB915787

All in violation of Title 18, United States Code, Sections 922(a)(6) and 924(a)(2).

FORFEITURE ALLEGATIONS
U.S.C. § 924(d) and 28 U.S.C. § 2461
Criminal Forfeiture

The allegations contained in this Indictment are hereby re-alleged and incorporated by reference for the purpose of alleging forfeiture pursuant to Title 18 United States Code Section 924(d) and Title 28, United States Code, Section 2461.

1. Upon conviction of the offense charged in Counts 1-11 of this Indictment, Defendant Omar Shorter Jr. shall forfeit to the United States, pursuant to Title 18, United States Code, Section 924(d)(1) and 28 United States Code, Section 2461(c), any firearm or ammunition involved in or used in any knowing violation of said offense, including but not limited to:
 - a. Anderson Manufacturing, AM-15, 5.56x45mm, serial #20259903
 - b. Anderson Manufacturing, AM-15, 5.56x45mm, serial #20237328
 - c. Karri's Guns (Podunk, Inc.), 5.56x45mm, serial #A02171
 - d. Karri's Guns (Podunk, Inc.), 5.56x45mm, serial #A02172
 - e. Anderson Manufacturing, AM-15, 5.56x45mm, serial # 21085863
 - f. Anderson Manufacturing, AM-15, 5.56x45mm, serial #21085864
 - g. Karri's Guns (Podunk, Inc.) – Auto Ordnance, .223 caliber, serial #A02170
 - h. Glock, Model 29, 10mm, serial #BTHW713
 - i. Glock, Model 19, 9mm, serial #BTDD403

- j. Glock, Model 23, .40 caliber, serial #BTSN979
- k. Glock, Model 30, .45 caliber, serial #BTSV395
- l. SOTA Arms Inc., 5.56x45mm, serial #PA14799
- m. SOTA Arms Inc., 5.56x45mm, serial #PA14800
- n. SOTA Arms Inc., 5.56x45mm, serial #PA14795
- o. SOTA Arms Inc., 5.56x45mm, serial #PA4798
- p. Glock, model 43, 9mm pistol, serial #AFVH382
- q. Glock, model 23, .40 caliber pistol, serial #WPP092
- r. Taurus, model G3C, 9mm, serial #ADB915787
- s. Taurus, model G3C, 9mm, serial #ADB009420

THIS IS A TRUE BILL.

s/ Grand Jury Foreperson

Grand Jury Foreperson

DAWN N. ISON
United States Attorney

s/ Brandy R. McMillion

BRANDY R. McMILLION
Chief, General Crimes Unit
Assistant United States Attorney

s/ Jasmine Ayana Moore

JASMINE AYANA MOORE
Assistant United States Attorney

Dated: April 20, 2023

United States District Court
Eastern District of Michigan

Criminal Case Cover S

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NOTE: It is the responsibility of the Assistant U.S. Attorney signing this form to complete it accurately in all respects.

	Companion Case Number:
This may be a companion case based upon LCrR 57.10 (b)(4) ¹ :	Judge Assigned:
<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	AUSA's Initials: <i>JAM</i>

Case Title: USA v. Omar Shorter, Jr.County where offense occurred : Wayne County and elsewhereCheck One: Felony Misdemeanor Petty

Indictment/ Information --- no prior complaint.
 Indictment/ Information --- based upon prior complaint [Case number:]
 Indictment/ Information --- based upon LCrR 57.10 (d) [Complete Superseding section below].

Superseding to Case No: _____	Judge: _____
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Corrects errors; no additional charges or defendants.
 Involves, for plea purposes, different charges or adds counts.
 Embraces same subject matter but adds the additional defendants or charges below:

<u>Defendant name</u>	<u>Charges</u>	<u>Prior Complaint (if applicable)</u>
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Please take notice that the below listed Assistant United States Attorney is the attorney of record for the above captioned case.

April 20, 2023

Date

Jasmine Ayana Moore
 Jasmine Ayana Moore
 Assistant United States Attorney
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¹ Companion cases are matters in which it appears that (1) substantially similar evidence will be offered at trial, or (2) the same or related parties are present, and the cases arise out of the same transaction or occurrence. Cases may be companion cases even though one of them may have already been terminated.